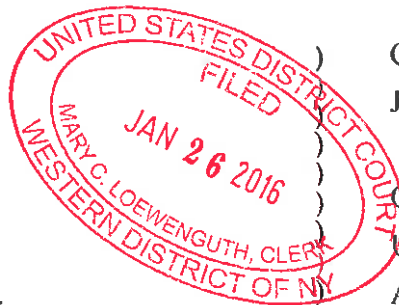


**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

Jonathan Paul Catlin
Plaintiff

vs.

Northland Group, Inc.
Defendant



CASE NO. **16 CV 6044 L**
JUDGE: _____

COMPLAINT FOR VIOLATIONS OF 47
U.S.C. §227;

ACTUAL DAMAGES, STATUTORY
DAMAGES and PUNITIVE DAMAGES

DEMAND FOR TRIAL BY JURY

INTRODUCTION & OPENING STATEMENT

This is an action brought by Plaintiff against Northland Group, Inc. for violations of the Telephone Consumer Protection Act, 47 USC § 227 (herein after "47 USC § 227").

I. JURISDICTION and VENUE

1. This action arises under 47 U.S.C. §227. The jurisdiction of this court is founded on federal question jurisdiction, 28 U.S.C. §1331.
2. Venue is proper because the events giving rise to Plaintiff's causes of action occurred within this district, as provided in 28 U.S.C. § 1391(b)(2).

II. PARTIES

3. Plaintiff, Jonathan Paul Catlin, herein after "Plaintiff", at all times relevant herein, was domiciled in the town of Naples, New York.
4. Plaintiff is informed and believes that Defendant, Northland Group, Inc., herein after "Defendant", is a Minnesota Corporation. Defendant's registered office address is: 7831 Glenroy Road #350, Edina, MN 55439.

PREVIOUS LAWSUITS IN STATE AND FEDERAL COURT

5. The plaintiff has **not** begun any other lawsuits in state or federal court dealing with the same facts involved in this action.

CONDITIONS PRECEDENT

6. All conditions precedent have been performed or have occurred.

COUNT 1

(47 U.S.C. §227; Prohibitions on calls to a cell phone)

7. Plaintiff repeats and re-alleges the allegations contained in paragraphs 1 through 7 above and incorporates the same as if set forth in full.

8. From about November 2013 through December 2013, Defendant called Plaintiff's cell phone no less than 15 times. Plaintiff intends to propound discovery to reveal the exact number of calls placed to Plaintiff's cell phone by Defendant.

9. Defendant used an automatic telephone dialing system to place these calls.

10. Plaintiff has no contract or business relationship with Defendant, and has never given Defendant express consent to call Plaintiff's cell phone.

11. As a direct result of Defendant's actions described in Count I, Plaintiff has suffered harassment, disruption of work flow, loss of productivity at work, disruption of family life, loss of quality time with family, loss of sleep, and emotional distress including, but not limited to, stress, agitation, anxiety, and frustration, all to his injury.

12. The federal basis for this claim is 47 U.S.C. §227(b)(1)(A) and 47 U.S.C. §227(b)(3).

SUMMARY OF RELIEF SOUGHT

WHEREFORE, Plaintiff prays for relief against Defendant as follows:

- a) For statutory damages of \$1,500.00 per call;
- b) Actual damages;
- c) For punitive damages in the amount allowed by law;
- d) Reasonable costs of time to pursue the suit;
- e) Reasonable Attorneys fees, and costs; and,
- f) Such other relief as this Court may find to be just and proper.

DEMAND FOR TRIAL BY JURY

I DECLARE UNDER PENALTY OF PERJURY THE FOREGOING IS TRUE AND
CORRECT TO THE BEST OF MY KNOWLEDGE.

EXECUTED this 22nd day of January, 2016.







Original Signature






Jonathan Paul Catlin
c/o PO Box 313
Naples, Idaho
Cell: 208-627-3950
e-mail: myfriendstenthousand@gmail.com







In Proper Person

Exhibit A

KRISTINE R. RADDIS
NOTARY PUBLIC
STATE OF IDAHO

Phone 10:38 ok		
Northwood Group		
	12/19/13 (866) 572-8959 w Duration: 00:00	2:58 p
	12/16/13 (866) 572-8959 w Duration: 00:00	3:35 p
	12/13/13 (866) 572-8959 w Duration: 00:00	10:46 a
	12/11/13 (866) 572-8959 w Duration: 00:00	7:03 p
	12/10/13 (866) 572-8959 w Duration: 00:00	1:06 p
12/9/13 9:16 a		
Call Menu		

Phone 10:37 ok		
	12/3/13 (866) 572-8959 w Duration: 00:00	9:40 a
	12/2/13 (866) 572-8959 w Duration: 00:00	9:25 a
	11/26/13 (866) 572-8959 w Duration: 00:00	10:04 a
	11/25/13 (866) 572-8959 w Duration: 00:00	6:13 p
	11/25/13 (866) 572-8959 w Duration: 00:55	5:31 p
Call Menu		

Phone 10:38 ok		
	12/10/13 (866) 572-8959 w Duration: 00:00	1:06 p
	12/9/13 (866) 572-8959 w Duration: 00:00	9:16 a
	12/6/13 (866) 572-8959 w Duration: 00:00	4:59 p
	12/5/13 (866) 572-8959 w Duration: 00:00	3:22 p
	12/4/13 (866) 572-8959 w Duration: 00:00	6:00 p
	12/3/13 (866) 572-8959 w Duration: 00:00	9:40 a
Call Menu		

Jonathan Citlin
PO Box 313
Naples, ID 83847

U.S. POSTAGE
PONDERAY, ID
83852
JAN 22 '16
AMOUNT
\$1.64
R2302E125071 03



14814



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Clerk, US District Court
United States Courthouse
100 State Street
Rochester, NY 14614-1387